

CERTIFICATE OF SERVICE

I, David Hudson, certify that the following is true and correct:

I am a citizen of the United States, State of California, am over eighteen years of age, and am not a party to the within cause.

My business address is 140 New Montgomery Street, San Francisco, California 94105.

On December 26, 1997, I served the attached "COMMENTS OF SBC COMPANIES" in CC Docket No. 92-237 by placing true copies thereof in envelopes addressed to the parties in the attached list, which envelopes, with postage thereon fully prepaid, I then sealed and deposited in a mailbox regularly maintained by the United States Government in the City and County of San Francisco, State of California.

Executed this 26th day of December, 1997 at San Francisco, California.

PACIFIC TELESIS GROUP
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By: 
David Hudson

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED

DEC 29 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In The Matter of)

Administration of the North)
American Numbering Plan Carrier)
Identification Codes (CICs))

CC DOCKET NO. 92-237

**COMMENTS OF THE
TELECOMMUNICATIONS RESELLERS ASSOCIATION
TO PETITIONS FOR CLARIFICATION AND RECONSIDERATION**

The Telecommunications Resellers Association ("TRA"),¹ through undersigned counsel and pursuant to Section 1.429(f) of the Commission's Rules, 47 C.F.R. § 1.429(f), hereby opposes the Petition for Reconsideration ("Petition") filed by America One Communications Inc. ("America One") of the Commission's Order on Reconsideration in the above-referenced docket.²

¹ A national trade association, TRA represents more than 650 entities engaged in, or providing products and services in support of, telecommunications resale. TRA was created, and carries a continuing mandate, to foster and promote landline and wireless telecommunications resale, to support the telecommunications resale industry and to protect the interests of entities engaged in the resale of telecommunications services. Although initially engaged almost exclusively in the provision of domestic interexchange telecommunications services, TRA's resale carrier members have aggressively entered new markets and are now actively reselling international, wireless, enhanced and internet services. TRA's resale carrier members are also among the many new market entrants that are or soon will be offering local exchange and/or exchange access services.

² Administration of the North American Numbering Plan. Carrier Identification Codes (CICs), CC Docket No. 92-237, FCC 97-386 (released October 22, 1997) ("Reconsideration Order"). A Petition for Clarification of the Reconsideration Order has also been filed by BellSouth Corporation (BellSouth). Therein, the carrier asks the Commission whether it may "begin phased implementation of three-digit CIC blocking on July 1, 1998." Petition for Clarification at 4. While TRA expresses no view as to the validity of BellSouth's assertion that blocking of 3-digit CICs will, or should, require two months to implement, TRA agrees with BellSouth that both the text and the intent of the Reconsideration Order support the conclusion that the transition period during which 3- or 4-digit CICs and 5- or 7-digit carrier access codes ("CACs") may be utilized should extend a full six months; that is, up to and including June 30, 1998.

In that Petition, America One urges the Commission to reinstate January 1, 1998 as the close of the transition from 3- to 4-digit carrier identification codes ("CICs") and from 5- to 7-digit carrier access codes ("CACs").

As the Commission appropriately recognized in the Reconsideration Order, extension of the CIC code transition period was necessary in order to avoid the serious adverse consequences which a "flash-cut" transformation from 3- to 4-digit CICs and from 5- to 7-digit CACs would cause carriers and consumers alike. Through its Petition, which focuses exclusively on the perceived detriment this brief extension will bring to bear on its own proposed business plan, America One seeks to revisit these consequences upon the telecommunications industry and the consuming public in order that no carrier may possess even a brief dialing advantage over America One, an entity which has only recently entered the casual calling market and thus has been assigned a 4-digit CIC. In so doing, America One myopically dismisses the record upon which the Reconsideration Order was issued and altogether fails to acknowledge that the establishment of a two-tiered implementation schedule serves important functions both for consumers and all segments of the telecommunications industry, including "casual calling" providers such as itself. These broader considerations are no less compelling now, mere days from the implementation deadline which America One seeks to have re-established, and strongly militate against any modification to the Reconsideration Order.

Among the difficulties which would accompany a flash-cut transformation from 3- to 4-digit CICs were (i) the inability to reprogram customer premises equipment in a highly compressed time period, (ii) the lack of a graceful transition period necessary to both education and acclimate consumers to the use of 4-digit CICs; (iii) the continuing unavailability of 4-digit

CIC capability in many end office switches, and (iv) the absence of a distinct local exchange carrier ("LEC") switch upgrade deadline significantly prior to the close of the transition period. As the Reconsideration Order recognizes, this last shortcoming effectively mandated a "flash-cut" conversion to 7-digit CACs while all but precluding effective consumer education efforts and affording no adjustment period during which consumers could modify their dialing habits or reprogram equipment to incorporate use of the longer codes. In its comments in this proceeding, TRA, along with virtually all other commenters, urged the Commission to eliminate unnecessary burdens on carriers and consumers by extending the close of the transition period, while at the same time maintaining the January 1, 1998 deadline as the date by which 4-digit CIC capability must be provided in all equal access-capable LEC switches. The Commission, by taking just such action, has ameliorated to some degree the difficulties occasioned by the Second Report and Order and has done so in a manner intentionally designed to minimize disruption of, or delay to, the achievement of the policy goals underlying the transition to mandatory use of 4-digit CICs.

The Reconsideration Order's modest extension of the transition period will not disproportionately harm America One or the numerous other carriers which have entered, or soon will enter the long distance market with a 4-digit CIC.³ Conversely, as the Commission has recognized, strict adherence to the January 1, 1998 deadline would have resulted in the inability of significant numbers of consumers -- including America One's customers -- to complete long distance calls on a "dial-around" basis after that date, may have caused consumers to experience call blocking because equipment upgrades or replacements could not be completed within the

³ Indeed, while a sizeable percentage of TRA's more than 650 members entered the industry at a time when 3-digit CICs were routinely assigned, a significant number have entered the market, and participate actively therein, with 4-digit CICs. TRA's comments here are submitted on behalf of all of its resale carrier members.

span of months between the release of the Second Report and Order and the January 1, 1998 effective date, and would have provided no buffer period during which consumers might adjust to suddenly inoperative routing mechanisms which had functioned perfectly merely a day earlier.

That the Commission, finding both the public interest and the procompetitive goals of the Telecommunications Act of 1996⁴ to be facilitated thereby, remains committed to "moving to the use of only four-digit CICs as soon as possible,"⁵ apparently provides little comfort to America One, whose fundamental disagreement with the Reconsideration Order appears to be that the Commission has modified the CIC transition deadline after consideration of technical implementation difficulties and the advisability of an opportunity for carriers to engage in consumer education efforts – concerns which touch the entire telecommunications industry – rather than intuiting that America One would "abandon[] its plans to acquire another carrier, and move[] forward with plans to roll-out a casual calling product based on its own four-digit CIC in Fall 1997" in reliance upon what the carrier characterizes as "the Commission's adamant determination that all carriers would have to migrate to four-digit CICs by January 1, 1998."⁶

TRA fails to see what detrimental reliance America One could have experienced by "proceed[ing] to invest in and develop a four-digit CIC-based casual calling service"⁷ on the basis of the Second Report and Order's January 1, 1998 implementation deadline, a decision which was almost immediately upon its release the subject of multiple petitions for

⁴ Pub. L. No. 104-104, 110 Stat. 56 (1996).

⁵ Administration of the North American Numbering Plan, Carrier Identification Codes (CICs), CC Docket No. 92-237, FCC 97-38, ¶ 25 (released October 22, 1997).

⁶ Petition at 5.

⁷ Id.

reconsideration and an emergency motion for stay,⁸ and which did not alter the ultimate requirement that all carriers must soon utilize a 4-digit CIC. Indeed, in light of the Commission's very brief extension of the transition period, America One could hardly have delayed the cited investment and development activities in any event.

America One's impassioned plea that the Commission overturn a well-reasoned decision of broad applicability to reinstate all the difficulties which the decision was meant to remedy fails to advance any interest beyond America One's parochial and self-serving agenda. Further, America One's provision of casual calling services is in no way inhibited as a result of the Reconsideration Order; the carrier, and all other carriers which have been assigned 4-digit CICs, may embark upon a casual calling service offering to precisely the same extent as if a January 1, 1998 implementation date had been retained. Indeed, the Petition indicates that America One has done exactly that.⁹ Thus, the Commission is asked to sanction the potential disruption of service to consumers for the sole purpose that every carrier might be "stuck in the same boat" as America One believes it has unfairly been placed.

The Commission is fully aware that "because customers of some carriers may need to dial seven digit CACs while those of other carriers may dial five digit CACs, there will be disparity."¹⁰ Indeed, the Commission has stated that "[w]e agree with parties arguing that a competitive disparity would result if customers of some carriers could access their services by dialing five-digit CACs, while customers of other carriers would be forced to dial seven-digit

⁸ Administration of the North American Numbering Plan, Carrier Identification Codes (CICs), CC Docket No. 92-237, FCC 97-386 at ¶ 3.

⁹ Petition at 5.

¹⁰ Administration of the North American Numbering Plan Carrier Identification Codes (CICs) Petition for Rulemaking of VarTec Telecom., Inc., 12 FCC Rcd. 8024, ¶ 8 (1997).

codes."¹¹ Identifying this disparity as "a significant reason for our decision on reconsideration to extend the transition *only for a short period*,"¹² the Commission has nonetheless held that neither "the existence of CACs of varying lengths during the transition" nor the transition itself "violate[s] Section 201(b)'s prohibition against unreasonable practices or Section 202(a)'s prohibition against unreasonable discrimination." To the contrary, the Commission has held that "[t]he transition is reasonable and necessary to avoid a flash-cut conversion to four digit CICs which would be *contrary to the public interest*."¹³

Additionally, as the Commission notes, "some LECs report that they will not convert their switches" by the January 1, 1998 deadline.¹⁴ The Commission, in the Second Report and Order, was optimistic that the number of LECs in this category will constitute a relatively small segment of the carriers subject to the January 1, 1998 implementation deadline; the Commission simultaneously cautioned carriers, however, to "continue to strive, to achieve compliance with the four-digit CIC requirement by January 1, 1998."¹⁵ Since the release of the Second Report and Order, several LECs have petitioned for, and been granted, waivers of the Second Report and Order's January 1, 1998 implementation deadline; indeed, two such waivers extend the implementation deadline for the respective LECs beyond even the June 30, 1998 close

¹¹ Administration of the North American Numbering Plan, Carrier Identification Codes (CICs), CC Docket No. 92-237, FCC 97-386 at ¶ 49.

¹² Id. (emphasis added.)

¹³ Administration of the North American Numbering Plan Carrier Identification Codes (CICs) Petition for Rulemaking of VarTec Telecom., Inc., 12 FCC Rcd. 8024 at ¶ 32 (emphasis added).

¹⁴ Administration of the North American Numbering Plan, Carrier Identification Codes (CICs), CC Docket No. 92-237, FCC 97-386 at ¶ 24.

¹⁵ Id.

of the CIC transition period.¹⁶ The existence of even a single LEC subject to the January 1, 1998 deadline which cannot, or will not, meet that implementation schedule militates strongly against grant of America One's Petition, since termination of the transition period will require the universal availability of 4-digit CIC technology if disruption of service to consumers is to be avoided.

America One has refuted none of the Commission's grounds supporting the brief extension of the CIC transition period through June 30, 1998, least of all the Commission's concern that "[a] flash-cut conversion would give . . . no warning to callers that they may no longer dial five digit CACs, but instead must dial seven digit CACs."¹⁷ Indeed, the Petition does not even acknowledge the Commission's determination that

"[i]ntroducing a second stage and thereby creating a two-step transition process will give IXCs the time they need to coordinate the conversion with LECs, and to prepare their networks and educate their customers about necessary dialing changes. The record indicates that IXCs, to prepare their networks for complete conversion to four-digit CICs, may need to engage in, for example, reprogramming automatic dialers and PBXs, troubleshooting, testing and verifying the use of four-digit CICs with other carriers. . . our decision not to extend the transition more than six months is based on our concern that there be enough four-digit CICs to meet the demand for CIC assignments during the transition, and that the anticompetitive effects of dialing disparity are minimized."¹⁸

¹⁶ Cuba City Telephone Exchange Company; Belmont Telephone Company; Hager Telecom, Inc.; Silver Star Telephone Company, Inc.; Deep River Mutual Telephone Company; Dixon Telephone Company; Ellsworth Cooperative Telephone Association; Frontier Communications of Schuyler, Iowa; Grand River Mutual Telephone Corporation; Griswold Cooperative Telephone Company; La Porte City Telephone Company; Ogden River Telephone Company; River Valley Telephone Cooperative; Webb-Dickens Telephone Company ("Order"), NSD File Nos. 97-52; 97-58; 97-57; 97-62; 97-61, DA 97-2614, ¶ 5 (released December 15, 1997).

¹⁷ Administration of the North American Numbering Plan Carrier Identification Codes (CICs) Petition for Rulemaking of VarTec Telecom, Inc., 12 FCC Rcd. 8024 at ¶ 30.

¹⁸ Administration of the North American Numbering Plan Carrier Identification Codes (CICs), CC Docket No. 92-237, FCC 97-386 at ¶ 25 (emphasis added; internal footnotes omitted).

By vigorously advocating the reinstatement of a flash-cut conversion which would not so much confer a benefit upon itself but rather, would significantly burden numerous other carriers and consumers as well, America One demonstrates clearly that its own private campaign is inconsistent with the underlying goal of the Commission in this matter, namely, the development of "a CIC expansion plan for the benefit of the entire industry".¹⁹ Accordingly, the Telecommunications Resellers Association urges the Commission to deny the Petition for Reconsideration of America One in order that consumers and carriers alike may benefit from a full six months during which equipment modifications and consumer education efforts may be undertaken in order to facilitate a smooth transition to the use of 4-digit CICs, an integral element of the Commission's CIC expansion plan.

Respectfully submitted,

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RESELLERS ASSOCIATION**

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December 29, 1997

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¹⁹ Id., at ¶ 51.

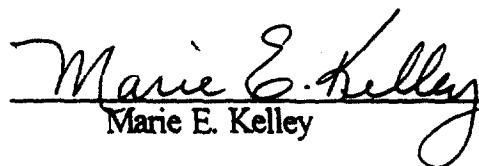
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I, Marie E. Kelley, hereby certify that copies of the foregoing document were mailed this 29th day of December, 1997, by United States First Class mail, postage prepaid, to the following:

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Washington, D.C. 20554

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DEC 29 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Administration of the
North American Numbering Plan,
Carrier Identification Codes (CICs)

CC Docket No. 92-237

OPPOSITION OF AT&T CORP.

Pursuant to Section 1.429 of the Commission's Rules, 47 C.F.R. § 1.429, and the Commission's Public Notice, Report No. 2242, released December 8, 1997 and published December 12, 1997 (62 Fed. Reg. 65427), AT&T Corp. ("AT&T") submits this opposition to BellSouth's petition for clarification of a limited portion of the CIC Reconsideration Order in this docket.¹

In the CIC Code Reconsideration Order (paras. 4, 20, 25-27), the Commission determined that the transition for conversion from three-digit Feature Group D Carrier Identification Codes ("CICs") to four-digit CICs will end for interexchange carriers ("IXCs") on June 30, 1998.² In

¹ In the Matter of Administration of the North American Numbering Plan Carrier Identification Codes (CICs), CC Docket No. 92-237, Order on Reconsideration, Order on Application for Review, and Second Further Notice of Proposed Rulemaking, FCC 97-386, released October 22, 1997 ("CIC Reconsideration Order").

² The three-digit CIC is part of a five-digit carrier access code (10XXX), whereas the four-digit CIC is part

(footnote continued on following page)

reaching this determination, the Commission found that shortening the transition period during which both the three-digit and four-digit CICs and their respective five-digit and seven-digit carrier access code ("CAC") dialing arrangements would be recognized will serve the overall procompetitive purposes of the 1996 Telecommunications Act. Yet, in consideration of the needs of IXC's and others to educate their customers to the new dialing arrangement, it created a two-step transition, requiring local exchange carriers ("LECs") with equal access capability to recognize four-digit CICs by January 1, 1998 and IXC's by June 30, 1998, after which time only CICs four-digits in length would be recognized (para. 4).

In its clarification petition, BellSouth (at 2, 5) states that, although it will have completed all changes necessary to recognize four-digit CICs by January 1, 1998, it asks for permission not to commence blocking three-digit CICs until June 30, 1998, a process which will take approximately sixty days or until September 1, 1998. As a result, if this clarification were granted, at least some

(footnote continued from previous page)

of a seven-digit carrier access code (101XXXX). During the transition period, both three-digit and four-digit CICs could be utilized. Once the transition period is over, all customers would be required to use the four-digit CIC (thus, AT&T's carrier access code would then become 1010288).

calls using three-digit CICs will complete after June 30, 1998, the scheduled end of the IXC transition period.

The Commission has thoroughly considered and reviewed the issue of when the transition period should end and has arrived at the schedule identified above. At this juncture, there is no need for further clarification as BellSouth requests. Instead, if BellSouth needs two months to comply fully with the June 30, 1998 cutover date, then it should commence its efforts before May 1.

In all events, the CIC Reconsideration Order (para. 26) requires LECs to offer "a standard intercept message beginning on or before June 30, 1998, explaining that a dialing pattern change has occurred and instructing the caller to contact its IXC for further information" (emphasis added). The Commission further directed that "LECs must consult with IXCs and reach agreement on the content of the message and on the period of time during which the message will be provided." *Id.* Thus, if BellSouth needs to employ a phased approach to blocking three-digit CICs in its network, then it should have the intercept message in place at the time a particular switch is cutover to ensure that consumers will be able to obtain appropriate dialing instructions.

The need to adhere to the June 30, 1998 conversion date is compelling. The Commission decided to end the transition as soon as practicable to lessen any negative effects of the disparity that may arise during the

transition.³ The Commission's ultimate solution is to put all carriers at parity by requiring identical dialing patterns.⁴ America One's petition for reconsideration underscores that the current dialing disparity has an adverse impact on new "dial around" providers that rely on four-digit codes. While AT&T believes that it is unnecessary and inadvisable to again reconsider the June 30, 1998 date as America One requests, there is certainly no basis to, in effect, extend it.

³ In the Matter of Administration of the North American Numbering Plan Carrier Identification Codes (CICs), CC Docket No. 92-237, Second Report and Order, FCC 97-125, released April 11, 1997, para. 32 ("Second Report").

⁴ See also Pennsylvania Public Utility Commission Petition for Expedited Waiver of 47 CFR Section 52.19 for Area Code 412 Relief, CC Docket 96-98, Order, DA 97-675, released April 4, 1997, para. 15 (recognizing the inherent competitive advantage of dialing fewer digits), citing Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Docket No. 96-98, Second Report and Order, FCC 96-333, 61 Fed. Reg. 47284, 47330 (1996).

CONCLUSION

WHEREFORE, the Commission should deny BellSouth's petition for clarification and adhere to the June 30, 1998 mandatory IXC transition date for conversion to the four-digit CIC codes.

Respectfully submitted,

AT&T CORP.

By /s/ Mark C. Rosenblum

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December 29, 1997

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I, Viola J. Carlone, do hereby certify that on this 29th day of December, 1997, a copy of the foregoing Opposition of AT&T Corp. was mailed by U.S. first class mail, postage prepaid, to the parties on the attached Service List.

/s/Viola J. Carlone

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Before the
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Washington, DC 20554

In the Matter of)	
)	
Administration of the)	CC Docket No. 92-237
North American Numbering Plan)	
Carrier Identification Codes (CICs))	

COMMENTS OF U S WEST, INC.

BellSouth Corporation ("BSC") recently filed a "Petition for Clarification," in the above-captioned proceeding.¹ In that Petition, BSC quoted from the Federal Communications Commission's ("Commission") language in its recently adopted CIC Reconsideration Order.² There the Commission stated that, by January 1, 1998, "all LECs [local exchange carriers] that provide equal access must have completed switch changes to recognize four-digit CICs [Carrier Identification Codes]." Additionally, the CIC Reconsideration Order established a time from January 1 to June 30, 1998 for the preparation of other carrier networks and customer education regarding seven-digit Carrier Access Code ("CAC") dialing. After June 30, 1998, "only four-digit CICs and seven-digit CACs will be

¹ BellSouth Petition for Clarification filed Nov. 26, 1997 ("Petition").

² In the Matter of Administration of the North American Numbering Plan, Carrier Identification Codes (CICs), CC Docket No. 93-237, Order on Reconsideration, Order on Application for Review, and Second Further Notice of Proposed Rulemaking, rel. Oct. 22, 1997 ("CIC Reconsideration Order").

³ Id. ¶¶ 4, 20.

recognized.”⁴

BSC notes that BellSouth Telecommunications, Inc. (“BST”) “will have completed all changes necessary in its equal access switches to recognize four-digit CICs” by the mandated January 1, 1998 date.⁵ However, BSC seeks clarification regarding the Commission’s mandate included in the second quoted sentence above, i.e., that having to do with CIC “recognition” after June 30, 1998. BSC notes that the process of blocking three-digit CICs is one that “can only be accomplished in a phased manner,” taking about two months.⁶

U S WEST, Inc. (“U S WEST”) will face the same factual situation as that described by BSC. However, we do not believe that a clarification of the Commission’s CIC Reconsideration Order is necessary to allow for the phased-in process described by BSC. In order for there to be a full permissive dialing period from January 1, 1998 through June 30, 1998, the phasing in of the blocking (or the recognition) of three-digit CICs cannot begin until July 1, 1998. And, as BSC notes, “[a]s a matter of engineering, three-digit CIC blocking cannot be flash-cut in each and every BST switch.”⁷

However, the phased-in blocking of three-digit CICs is of little regulatory, market or industry consequence. By July 1, 1998, individuals will be dialing four-digit CICs because they will have been previously advised that such dialing would

⁴ Id.

⁵ Petition at 2.

⁶ Id.

⁷ Id. at n.5.

be required after June 30, 1998. For those few individuals who happen to dial a five-digit CAC⁸ in a switch that has not yet been programmed to block the call, calls will go through. However, within weeks, a similar dialing attempt will fail. The "truth" of the prior education campaigns will prove itself in.

Nor will carriers be adversely affected by the phased-in process. No particular carrier's customers will be able to be "advantaged" over other carriers, because the number of switches where the blocking has been implemented will continue to grow across the nation. Furthermore, customers utilizing CIC calling patterns are undoubtedly fairly spread out among carriers, leaving any customer of any carrier as likely to complete (or not) a call utilizing a three-digit CIC.⁹

For all of the above reasons, U S WEST did not read the Commission's CIC Reconsideration Order to prohibit the type of phased-in approach described by BSC. Indeed, such phased-in network implementations are not uncommon. And, given the extremely limited and temporary nature of the phased-in deployment, U S WEST saw no conflict between the deployment and the Commission's mandate.

Should the Commission disagree, however, U S WEST supports BSC's Petition in its entirety, with the additional request that the "clarification" run to all affected LECs.¹⁰

⁸ BSC itself notes that such calling would be "inadvertent." Id. at 3.

⁹ As BSC notes, the three-digit CIC call completion environment would be "limited, arbitrary and temporary." Id.

¹⁰ Comments of MCI Telecommunications Corporation in Support of BellSouth's Petition for Clarification, filed Dec. 4, 1997, at 2.

Should the Commission grant BSC's request for clarification, U S WEST sees no reason for the Commission to require LECs "to publicly disclose their pre-implementation and quality control plans," as suggested by MCI." MCI presents no compelling evidence to support its requested mandate.

MCI claims that it needs Commission intercession -- *via* a formal regulatory mandate -- to protect it from the competitive disadvantage it might suffer if it remains in the dark about LECs' phased-in CIC blocking plans. Yet it never describes that disadvantage. Nor does it reconcile its acknowledgment of ongoing "industry group meetings"¹² (wherein MCI apparently first learned about the need for phased-in deployment) and its references to "coordination efforts . . . already underway [where] industry participants meet regularly to discuss the many details associated with accomplishing a smooth and orderly transition to [7-digit CAC] dialing, with as little customer confusion as possible"¹³ with a presumed state of ignorance regarding LEC CIC blocking implementation. Both belie the need for further formal regulatory insinuation in the process.¹⁴ For that reason, if the

¹¹ Id. at 1.

¹² Id. at n.5.

¹³ Id. at 4.

¹⁴ MCI not only fails to make a case for carrier reporting in the first instance, but it provides no cost/benefit analysis that would support weekly reporting by carriers. Id. at 5. Carriers are always free to inquire or rely on reporting information already voluntarily provided by LECs through web sites or account managers or through some other type of reporting vehicles.

Commission deems it appropriate to issue a clarification around the issues raised by BSC, it should not include the requested regulatory relief sought by MCI as a condition.

Respectfully submitted,

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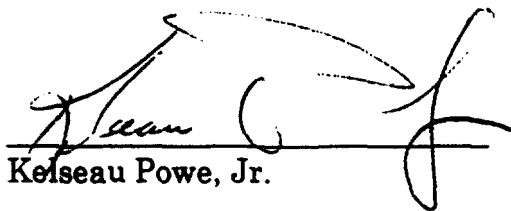
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Of Counsel,
Dan L. Poole

December 29, 1997

CERTIFICATE OF SERVICE

I, Kelseau Powe Jr., do hereby certify that on this 29th day of December, 1997, I have caused a copy of the foregoing **COMMENTS OF U S WEST, INC.** to be served, via first-class United States Mail, postage prepaid, upon the persons listed on the attached service list.



Kelseau Powe, Jr.

***Served via hand-delivery**

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